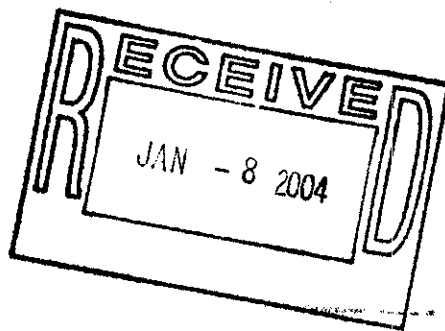


Rochelle L. Hardaway

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Amesbury Public Schools



Complaint

Parties

04 10101 RGS

MAGISTRATE JUDGE Bowler

1. The plaintiff, Rochelle L. Hardaway in the county of Middlesex, Massachusetts and is a citizen of the United States.
2. The defendants Amesbury Public Schools, Dr. Gerber, Superintendent, place of business 111 Main Street Amesbury, Massachusetts 01913.

Jurisdiction

3. This court has jurisdiction over this matter :
 Count A United States Constitution, Count B Civil Rights, Count C Unfair and Deceptive practices made against plaintiff.

Facts

4. The defendants unlawfully, knowingly and wilfully lied, deceived and discriminated against the plaintiff.
5. The plaintiff was appointed to a teaching assistant position in the Amesbury Public School for the 1999-2000 school year. The goal of this program was to teach daily life skills through active participation.
6. During the first three months the plaintiff was asked to run many personal errands for her immediate supervisor Fran McConnell.
Examples: walking a litter up to the clinic for her daughter Jan.
7. Plaintiff was asked on several occasions by Mrs. McConnell to take children to her home so that they could pet the kittens and bake a cake. This observation was made by several teachers who told plaintiff that taking these children especially this population

of children to your home can result in some serious problems for you. Fran knows how dangerous this could become for you.

8.

Plaintiff was asked several times to transport children in her automobile. Again Fran asked plaintiff to do something terrible wrong.

9.

Plaintiff was asked several times to take a 15 year old male student into the bathroom and assist with washing under his arms. Plaintiff was again approached by another teacher and told that you can't ever close yourself up in a bathroom with a student alone. Again Fran McConnell requested plaintiff to do something that was very wrong.

10.

Plaintiff was handed an evaluation form to be filled out at the end of the school year by all school staff. Each staff member fills them out and has them signed by their immediate supervisors, and then an appointment is made

with either the principal or the two assistant principals. The plaintiff's appointment was made with the principal so she had Fran McConnell sign the evaluation and she passed it in to the secretary. When I met with Mr. Tiezzi principal on June 6, 2000 the original evaluation was replaced with an evaluation done by Fran McConnell. The plaintiff being the only African American employee in the entire school system was not entitled to receive the same treatment as her co-workers. Why was the plaintiff the only employee who was not allowed to submit her own evaluation?

11. The plaintiff was later offered a position after school began to help out the secretaries in the superintendents office where she would be safe.

12. Plaintiff requests the court to order damages, pain and suffering in the amount of five million dollars (\$5,000,000.00) and punitive damages in the amount of five million dollars (\$5,000,000.00). Or any other amount the court deems appropriate.
13. All costs and legal fees
14. Wherefore, the plaintiff, Rochelle L. Hardaway, demands judgement against the defendants and for such other relief as the court deems just.
15. The plaintiff demands trial by jury.